

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:21-cr-00127

RAYMOND DUGAN

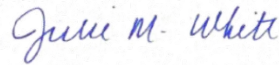
UNITED STATES PROPOSED SUPPLEMENTAL JURY INSTRUCTION

Comes now the United States of America, by Julie M. White, Assistant United States Attorney for the Southern District of West Virginia, and submits the following proposed jury instruction.

Respectfully submitted,

WILLIAM S. THOMPSON  
United States Attorney

By:



/s/ Julie M. White  
JULIE M. WHITE  
Assistant United States Attorney  
WV Bar No. 13971  
300 Virginia Street, East Room 4000  
Charleston, WV 25301  
Telephone: 304-345-2200  
Fax: 304-347-5104  
Email: Julie.white@usdoj.gov

**UNITED STATES PROPOSED SUPPLEMENTAL INSTRUCTION NO. 1**

**DEFINITIONS**

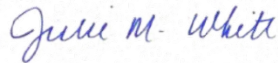
**PREPUBESCENT**

A minor is prepubescent if he or she has not reached puberty,  
or a minor who has not attained twelve years of age.

**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing "UNITED STATES PROPOSED SUPPLEMENTAL JURY INSTRUCTION" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 10th day of May, 2022 to:

David Schles, Esq.  
815 Quarrier Street, Suite 306  
Charleston, WV 25301



/s/ Julie M. White  
JULIE M. WHITE  
Assistant United States Attorney  
WV Bar No. 13971  
300 Virginia Street, East Room 4000  
Charleston, WV 25301  
Telephone: 304-345-2200  
Fax: 304-347-5104  
Email: Julie.white@usdoj.gov